



Procedure: Clinic Staffing

Functional Area: IV Organization & Management

Section: C1a

Approval Date: 6/2015

Citation: 246.2; 246.6(b)(2); 246.10(b)(2)(iii); 246.7(d); 246.7(i)(9)

Revised Date: 7/2016

Purpose

Describe regulatory requirements for staffing and provide guidance on other staffing issues

Regulatory Requirements

The regulations related to clinic staffing require that a Competent Professional Authority (CPA) perform the following:

- Determine if an applicant is at nutritional risk through a medical and nutritional assessment
- Sign as the person making the nutritional risk determination
- Prescribe types and quantities of supplemental foods for each participant.

In assigning responsibilities and providing supervision, various state and federal statutes and regulations may apply. It is the local agency's responsibility that these requirements are met. Some of the statutes and regulations include:

- Medical Practices Act (scope of practice and supervisory requirements for nurses)
- Clinical Laboratory Improvement Amendments of 1988 (CLIA 88).

CPA Definition

The FNS regulatory definition of a CPA includes: physicians, nutritionists, dietitians, registered nurses, physicians' assistants and State or local medically trained health officials. For more specific guidance on qualifications for a CPA in the Nebraska WIC Program, see VIII.B.1a.

State Staffing Requirement

A local agency must make a CPA available to perform the functions listed above, at each clinic where certifications are performed.

Other Staffing Functions

Additional major staff functions at a WIC clinic include, but are not limited to:

- Appointment scheduling
- Collection of demographic data
- Review of Participant Agreement and Right To A Fair Hearing

**Other Staffing Functions
(Cont.)**

- Collection of ethnic and racial information
 - Collection of income data and other data from applicant which is not related to health and nutritional assessment.
 - Determination and documentation of income, residency, and categorical eligibility
 - Documentation of nutrition and health education and referrals
 - Check issuance, including education on how to use checks
 - Coordination and supervision.
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Staff Qualifications

The qualifications and numbers of staff persons to perform the duties above, will depend on:

- Clinic caseload
 - Plans for expansion
 - Seasonal variations
 - Cross-training of staff
 - Special needs of population services (example – Non-English speaking)
 - Degree of integration with other public health programs
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Staffing Small Clinics

Clinics where certifications are completed must be staffed by a minimum of two people regardless of clinic size. Clinics that have certain days where only check issuance or educations are held may be staffed by one person on those days.

Designation of Clinic Coordinator

The designation of a clinic coordinator is recommended if a supervisor or the Program Director does not attend clinic. This designation may be given to a staff person performing other functions. The purpose of a coordinator is to monitor clinic flow, resolve problems, and provide feedback to the Program Director regarding scheduling, supplies, and other aspects of managing the clinic site.

Designation of Training Coordinator

Each local agency is required to have a designated Training Coordinator. The Training Coordinator is responsible for assuring that all new employees complete the training process.
